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5 Lead Counsel for Plaintiffs  
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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 In re VELTI PLC SECURITIES LITIGATION )	Master File No. 3:13-cv-03889-WHO
12 _____ )	<u>CLASS ACTION</u>
13 This Document Relates To: )	STIPULATION AND ORDER SETTING
14 ALL ACTIONS. )	SCHEDULE FOR FILING OF
15 )	CONSOLIDATED COMPLAINT AND
16 )	RELATED MATTERS
17 _____ )	Date Action Filed: 8/22/13

1 WHEREAS, on December 3, 2013, the Court entered an Order Granting Motion to  
2 Consolidate and Appoint Lead Plaintiff (the “Lead Order”), which Lead Order appointed Bobby  
3 Yadegar and Ygar Capital LLC as Lead Plaintiff, and appointed The Weiser Law Firm, P.C. as Lead  
4 Counsel for the above-captioned consolidated securities class action (the “Action”).

5 WHEREAS, on December 3, 2013, the Court entered an Order Consolidating Cases and  
6 Setting Case Management Deadlines (the “Consolidation Order”), which Consolidation Order  
7 requires Lead Plaintiff and defendants to submit a stipulation and proposed order setting forth a  
8 proposed schedule for the filing of a consolidated complaint (or the designation of an operative  
9 complaint) (hereinafter referred to as the “Operative Complaint”), and a proposed briefing schedule  
10 for defendants’ anticipated motions in response to such Operative Complaint.

11 WHEREAS, as Lead Plaintiff notified the Court during the November 27, 2013 hearing in  
12 this Action, the individual complaints filed in the Action (which are now consolidated with, and into,  
13 the Action and are referred to herein as the “Individual Actions”) had not been served upon  
14 defendants according to publicly-available information at that time;

15 WHEREAS, Lead Plaintiff is in the process of completing service of the Individual Actions  
16 (via agreement with the undersigned counsel) upon Velti plc, Wilson W. Cheung, Jeffrey G. Ross,  
17 Winnie W. Tso, Jefferies LLC (f/k/a Jefferies and Company, Inc.), RBC Capital Markets, LLC,  
18 Needham & Company, LLC and Canaccord Genuity Inc. (collectively referred to herein as the  
19 “Represented Defendants”). Lead Plaintiff is continuing efforts to serve the remaining defendants.

20 WHEREAS, Lead Counsel has conferred with counsel for the Represented Defendants  
21 concerning a proposed schedule for the filing (or designation) of the Operative Complaint and a  
22 proposed schedule for the response by the Represented Defendants thereto;

23 WHEREAS, Lead Counsel has also conferred with counsel for the Represented Defendants  
24 concerning the filing of a pleading that may assert additional securities class allegations related to  
25 the Action or seek to join additional defendants to the Action (the “Additional Individual Action”),  
26 which Additional Individual Action will be subject to consolidation pursuant to the process set forth  
27 in the Consolidation Order for the consolidation of related cases, and that the undersigned parties  
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1 stipulate will not require a response by the Represented Defendants consistent with the manner in  
2 which the Court has ordered the treatment of the Individual Actions in the Consolidation Order;

3 WHEREAS Lead Plaintiff and the Represented Defendants seek the proposed schedule set  
4 forth herein to accommodate sufficient time for, inter alia, the service of the remaining defendants  
5 and efforts to include such defendants in a global schedule as to the anticipated motions directed at  
6 the Operative Complaint in the Action;

7 Accordingly, it is HEREBY STIPULATED between the undersigned parties that:

8 1. The deadline for Lead Plaintiff to file or designate the Operative Complaint shall be  
9 February 28, 2014;

10 2. If the Additional Individual Action is filed, defendants need not respond to such  
11 Additional Individual Action pursuant to the terms of the Consolidation Order;

12 3. Any motions directed to the Operative Complaint (the "Motion(s)") shall be filed on  
13 April 29, 2014;

14 4. Lead Plaintiff's opposition to such Motion(s) shall be filed on June 27, 2014;

15 5. Any reply by defendants in further support of the Motion(s) shall be filed on July 30,  
16 2014;

17 6. The hearing on such Motion(s) shall be scheduled for August 13, 2014, at 2:00 p.m.,  
18 or such further date as is set by the Court;

19 7. Within ten (10) business days of the filing of the Motion(s), the Lead Plaintiff and all  
20 defendants served in the Action shall submit a further stipulation and proposed order to the Court  
21 setting forth any requested page limit extensions to permit Lead Plaintiff to file one consolidated  
22 opposition to the Motion(s), to permit defendants to request page limit extensions to file a  
23 consolidated reply in support of the Motion(s), or to address any additional matters related to the  
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1 filing and hearing of the Motion(s) as the parties seek to raise with the Court.

2 IT IS SO STIPULATED.

3 DATED: December 13, 2013

Respectfully submitted,

4 THE WEISER LAW FIRM, P.C.  
5 KATHLEEN A. HERKENHOFF (168562)

6  
7 /s/ Kathleen A. Herkenhoff  
KATHLEEN A. HERKENHOFF

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Lead Counsel for Plaintiffs

19 DATED: December 13, 2013

20 WILSON SONSINI GOODRICH & ROSATI  
21 BORIS FELDMAN  
22 CYNTHIA A. DY

23 /s/ Cynthia A. Dy  
24 CYNTHIA A. DY

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Attorneys for Defendants Velti plc, Wilson W.  
Cheung, Jeffrey G. Ross and Winnie W. Tso

1 DATED: December 13, 2013

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9 Attorneys for Jefferies LLC (f/k/a Jefferies and  
10 Company, Inc.), RBC Capital Markets, LLC,  
11 Needham & Company, LLC and Canaccord  
Genuity Inc.

11 \* \* \*

12 **ORDER**

13 The Court, having considered the above stipulation, and good cause appearing therefore,  
14 hereby ORDERS that:

15 1. The deadline for Lead Plaintiff to file or designate the Operative Complaint shall be  
16 February 21, 2014;

17 2. If the Additional Individual Action is filed, defendants need not respond to such  
18 Additional Individual Action pursuant to the terms of the Consolidation Order;

19 3. Any Motion(s), as defined above, shall be filed on April 22, 2014;

20 4. Lead Plaintiff's opposition to such Motion(s) shall be filed on June 20, 2014;

21 5. Any reply by defendants in further support of the Motion(s) shall be filed on July 30,  
22 2014;

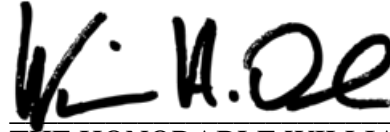
23 6. The hearing on such Motion(s) shall be scheduled for August 13, 2014, at 2:00 p.m.,  
24 or such further date as is set by the Court;

25 7. Within ten (10) business days of the filing of the Motion(s), the Lead Plaintiff and all  
26 defendants served in the Action shall submit a further stipulation and proposed order to the Court  
27 setting forth any requested page limit extensions to permit Lead Plaintiff to file one consolidated  
28

1 opposition to the Motion(s), to permit defendants to request page limit extensions to file a  
2 consolidated reply in support of the Motion(s), or to address any additional matters related to the  
3 filing and hearing of the Motion(s) as the parties seek to raise with the Court.

4 IT IS SO ORDERED.

5 DATED: December 24,  
6 2013 \_\_\_\_\_

A handwritten signature in black ink, appearing to read "W. H. Orrick", written over a horizontal line.

THE HONORABLE WILLIAM H. ORRICK  
DISTRICT COURT JUDGE